

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA**

**Plaintiff,**

**v.**

**COMMONWEALTH OF PUERTO RICO,  
et. al.**

**Defendants.**

**CIVIL NO. 12-2039 (GAG)**

**MOTION TO RESTRICT**

**TO THE HONORABLE COURT:**

**COME NOW** the Commonwealth of Puerto Rico and the Puerto Rico Police Bureau, through the undersigned counsel, and respectfully allege and pray as follows:

1. Paragraph 261 of the Agreement states that the PRPB shall file sealed and unsealed version of its status report. (See Agreement ¶ 261, Dkt. No. 60)
2. On September 24, 2018, the PRPB share a copy of its Status Report for this period with the TCA and USDOJ in the spanish language. (See Dkt. No. 955) On September, 28 2018, the PRPB submitted to the Court a sealed version of PRPB's Biannual Status Report in the English language. (See Dkt. No. 958)
3. Consequently, in compliance with Paragraph 261 of the Agreement and Standing Order No. 9, the appearing party respectfully requests that they be allowed to file the aforementioned document under seal and limit its viewing to case participants only.

**WHEREFORE**, it is respectfully requested from this Honorable Court to take notice of the above stated and that they be allowed to file the aforementioned document under seal and limit its viewing to case participants only.

**I HEREBY CERTIFY** that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, on October 1, 2018.

**WANDA VÁZQUEZ GARCED**  
Secretary of Justice

**WANDYMAR BURGOS VARGAS**  
Deputy Secretary in Charge of  
Litigation  
Department of Justice

**SUSANA PEÑAGARÍCANO BROWN**  
Director of Federal Litigation  
and Bankruptcy Division

**S/JOEL TORRES ORTIZ**  
**Joel Torres Ortiz**  
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